

Mr. William Goldstein  
Master Guard Corp.  
1200 E. Eighth Street  
Veedersburg, IN 47987

Re: Minor Source Modification No:  
045-11822-00011

Dear Mr. Goldstein:

Master Guard Corp. applied for a Part 70 operating permit on September 11, 1998 for operating a automotive bumper manufacturing plant. An application to modify the source was received on January 26, 2000. Pursuant to 326 IAC 2-7-10.5(d)(6) the following emission units are approved for construction at the source:

Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers' SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Shantanu S. Pahi or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Spahi

cc: File - Fountain County  
U.S. EPA, Region V  
Fountain County Health Department  
Air Compliance Section Inspector - Eric Courtwright  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Master Guard Corp.  
1200 E Eighth Street  
Veedersburg, Indiana 47987**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Second Minor Source Modification No.: 045-11822-00011

Issued by:  
Paul Dubenetzky, Branch Chief  
Office of Air Management

Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary automotive bumper manufacturing plant

Responsible Official:	William Goldstein
Source Address:	1200 E Eighth Street, Veedersburg, Indiana 47987
Mailing Address:	1200 E Eighth Street, Veedersburg, Indiana 47987
Phone Number:	(217) 367-5411
SIC Code:	3465
County Location:	Fountain
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD or Emission Offset Rules;
	Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers' SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Phase Construction Time Frame**

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

- (a) Construction of the chromium anodizing tanks has not begun within eighteen (18) months from the effective date of this approval or if during the construction of the chromium anodizing tanks, work is suspended for a continuous period of one (1) year or more.

The OAM may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

### **B.6      BACT Determination for Phase Constructions**

That pursuant to 40 CFR 52.21(j)(4), for phase construction projects, the determination of BACT shall be reviewed and modified as appropriate at the latest reasonable time which occurs no later than eighteen (18) months prior to commencement of construction of each independent phase of the project.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is in operation.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.6 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

at least sixty (60) days before the intended test date for all chromium electroplating facilities and no later than thirty-five (35) days prior to the intended test date. The

Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.7 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and



- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
  - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.9 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.

IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **C.10 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### **C.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

**C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this approval shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) Unless otherwise specified in this approval, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers' SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

#### D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1][40 CFR Part 63, Subpart N]

This facility is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached.

- (a) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the chromium anodizing tanks (CN-25 and CS-25) by not allowing the surface tension of the electroplating bath contained within each tank to exceed forty-five (45) dynes per centimeter (dynes/cm) ( $3.1 \times 10^{-3}$  pound-force per foot [lbf/ft]) at any time during operation of the tanks.

Pursuant to 40 CFR 63.343(c)(5)(i), the Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation, 0.01 mg/dscm ( $4.4 \times 10^{-6}$  gr/dscf) in lieu of establishing the maximum surface tension during an initial performance test.

- (b) The following work practice standards for the tanks are also applicable:

- (1) At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain the tanks, wetting agent, and monitoring equipment in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.4.
- (2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.4.
- (3) Determination of whether acceptable operation and maintenance procedures are being used will be based on the information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures and records; and inspection of the source.
- (4) Based on the results of the determination made under Condition D.1.2(b)(3) above, IDEM, OAM may require that the Permittee make changes to the OMP. Revisions may be required if IDEM, OAM finds that the plan:

- (A) Does not address a malfunction that has occurred;

- (B) Fails to provide for the operation of the tanks, air pollution control techniques (i.e., wetting agent), or process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
- (C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13) ]**

A Preventive Maintenance Plan (PMP), is required for chromium anodizing tanks.

**D.1.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]**

- (a) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3), shall be prepared and implemented no later than the compliance date. The OMP shall specify the operation and maintenance criteria for chromium anodizing tanks, wetting agent, and monitoring equipment, and shall include the following elements:
  - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension;
  - (2) Documentation of the operation and maintenance criteria for the tanks, wetting agent, and monitoring equipment;
  - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
  - (4) A systematic procedure for identifying malfunctions of the tanks, wetting agent, and monitoring equipment; and for implementing corrective actions to address such malfunctions;
- (b) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs.
- (c) Recordkeeping associated with the OMP is identified in Condition D.1.7. Reporting associated with the OMP is identified in Condition D.1.8.

**Compliance Determination Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)]**

**D.1.5 Testing Requirements [326 IAC 2-1.1-11 ] [326 IAC 2-7-6(1) ] [40 CFR 63.344]**

The Permittee is not required to test this facility by this permit. However, IDEM, OAM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the emission limit of 0.01 milligrams per dry standard cubic meter shall be determined by a performance test conducted in accordance with the provisions of 40 CFR 63.344.

**D.1.6 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343 (c)(5) & (7)]**

The Permittee shall monitor the surface tension of the anodizing baths in CN-25 and CS-25 Tanks. Operation of either tank at a surface tension of greater than 45 dynes per centimeter shall constitute noncompliance with the standards. The surface tension of each tank in operation shall be monitored according to the following schedule:

- (a) The surface tension shall be measured once every four (4) hours for the first forty (40) hours of operating time with a stalagmometer or a tensiometer as specified in 40 CFR 63, Appendix A, Method 306B (Surface Tension Measurement and Record Keeping for Chromium Plating Tanks Used at Electroplating and Anodizing Facilities). If a tensiometer is used to measure surface tension, the instructions given in ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be followed.
- (b) The time between monitoring can be increased if there have been no exceedances. Once there are no exceedances in forty (40) hours of operating time, the surface tension measurement may be conducted once every eight (8) hours of operating time. Once there are no exceedances during forty (40) hours of operating time, surface tension measurement may be conducted once every forty (40) hours of operating time on an ongoing basis or on an alternative monitoring schedule approved by IDEM, OAM until an exceedance occurs.

The source agrees to conduct surface tension measurements, at a minimum, once each day of operation provided there are no more than forty (40) hours of operating time between successive surface tension measurements.

- (c) Once an exceedance occurs through tank surface tension measurement, wetting agent shall be added and the original monitoring schedule of once every four (4) hours must be resumed. A subsequent decrease in frequency of monitoring surface tension is allowed as stated in Condition D.1.6(b) above.
- (d) Once a tank or bath solution is drained and a new solution is added, the original surface tension monitoring schedule of once every four (4) hours must be resumed with a subsequent decrease in monitoring frequency allowed as stated in Condition D.1.6(b) above.
- (e) Operating time for chromium electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.

#### **Record Keeping and Reporting Requirements[326 IAC 2-7-5(3) ] [326 IAC 2-7-19 ]**

##### **D.1.7 Record Keeping Requirements [40 CFR 63.346]**

- (a) The Permittee shall maintain records to document compliance with Conditions D.1.2 and D.1.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, be kept for a period of five (5) years, and include a minimum of the following:
  - (1) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard, i.e., surface tension of the bath in each tank, including the date and time the data are collected. If a tensiometer is used to measure surface tension, a copy of ASTM Method D 1331-89, "Standard Test Methods for Surface and Interfacial Tension of Solutions of Surface Active Agents," must be included with the log book containing surface tension measurements.

- (2) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs.
  - (3) The total process operating time of each tank, not both combined, during the reporting period.
  - (4) Records of the date, time, and amount of wetting agents added to the electroplating bath(s).
  - (5) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.8.
- (b) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of the tanks or until the tanks are no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

D.1.8 Reporting Requirements [40 CFR 63.345 & 63.347]

- (a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM prior to any change, modification, or reconstruction of the facility (including conducting electroplating operations that fall under the definition of hard chromium electroplating) or construction of a new facility or source. Notification shall be submitted as soon as practicable before the date construction or reconstruction commences.
- (b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.
- (c) The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled "Performance Testing" of this permit.
- (d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP required in Condition D.1.4, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the OMP. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.
- (e) The Permittee shall submit a summary report to document the ongoing compliance status of the facility using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.



- (1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.
- (2) If the monitoring data collected by the Permittee in accordance with Condition D.1.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Master Guard Corp.  
Source Address: 1200 E Eighth Street, Veedersburg, Indiana 47987  
Mailing Address: 1200 E Eighth Street, Veedersburg, Indiana 47987  
Source Modification No.: 045-11822-00011

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CHROMIUM ELECTROPLATING NESHAP  
ONGOING COMPLIANCE STATUS REPORT**

*(Complete this form for each affected tank)*

Source Name: Master Guard Corp.  
Source Address: 1200 E Eighth Street, Veedersburg, Indiana 47987  
Mailing Address: 1200 E Eighth Street, Veedersburg, Indiana 47987  
Source Modification No.: 045-11822-00011  
Tank ID #: \_\_\_\_\_  
Type of process: Anodizing  
Monitoring Parameter: Surface Tension of the Bath  
Parameter Value: Less than or Equal to 45 dynes per centimeter  
Limits: Total chromium concentration may not exceed \_\_\_\_0.01\_ mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.  
The frequency for completing this report may be altered by the IDEM, OAM, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.  
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period,  
and retain on site unless otherwise notified.

**This form consists of 2 pagesPage 1 of 2**

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:

TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD:

**MAJOR AND AREA SOURCES: CHECK ONE**

**9** NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.

**9** THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

**AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:**

IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

**HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:**  
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

## CHROMIUM ELECTROPLATING NESHAP ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

### ALL SOURCES: CHECK ONE

- 9** I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
- 9** THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Part 70 **Minor** Source Modification.

#### Source Background and Description

<b>Source Name:</b>	<b><i>Master Guard Corp.</i></b>
<b>Source Location:</b>	<b><i>1200 E Eighth Street, Veedersburg, IN 47987</i></b>
<b>County:</b>	<b><i>Fountain</i></b>
<b>SIC Code:</b>	<b><i>3465</i></b>
<b>Operation Permit No.:</b>	<b><i>045-10130-00011</i></b>
<b>Operation Permit Issuance Date:</b>	<b><i>Not yet issued</i></b>
<b>Minor Source Modification No.:</b>	<b><i>045-11822-00011</i></b>
<b>Permit Reviewer:</b>	<b><i>Spahi</i></b>

The Office of Air Management (OAM) has reviewed a modification application from Master Guard Corp. relating to the construction of the following emission units and pollution control devices:

- (a) Two chrome anodizing tanks, identified as CN-25 and CS-25, each with a maximum capacity of 90 nominal bumpers per hour, using a wetting agent and scrubbers' SCN-1 and SCS-1 as control and exhausting through stack S-3-1. Operation of the scrubber is not required for compliance.

#### History

On January 26, 2000, Master Guard Corp. submitted an application to the OAM requesting to add two (2) chrome anodizing tanks to their existing plant. Master Guard Corp. applied for a Title V operating permit on September 11, 1998, which is still pending.

#### Enforcement Issue

There are no enforcement actions pending.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-3-1	Anodizing Tank(CN-25)	24	2.67	8,850	70
S-3-1	Anodizing Tank(CS-25)	"	"	"	"

## Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 26, 2000.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document ( 1 Page.)

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.000831
PM-10	0.000831
SO <sub>2</sub>	0.0
VOC	0.0
CO	0.0
NO <sub>x</sub>	0.0

HAP's	Potential To Emit (tons/year)
Chromium	0.000399
TOTAL	0.000399

## Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(6) because a National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR 63) is applicable to these chromium anodizing tanks.

## County Attainment Status

The source is located in Fountain County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Fountain County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Fountain County has been classified as attainment or unclassifiable for PM and PM-10.. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	29.4
PM-10	29.4
SO <sub>2</sub>	0.098
VOC	< 249.0
CO	2.6
NO <sub>x</sub>	3.1

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon past permits issued to this source.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Two(2) Chromium Anodizing Tanks	0.00083	0.00083	0.0	0.0	0.0	0.0	0.00039
Total	0.00083	0.00083	0.0	0.0	0.0	0.0	0.00039

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Federal Rule and State Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The two (2) chromium anodizing tanks are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63. 340, Subpart N).

The chromium anodizing tanks are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-1-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-1-1, the chromium anodizing operations are subject to the following conditions:

- (1) The surface tension of the chromium anodizing solution contained with the tank shall not exceed forty-five (45) dynes per centimeter at any time during the operation of the tank if a wetting agent is used to demonstrate compliance.
- (2) Each time that surface tension monitoring exceeds forty-five (45) dynes per centimeter, the frequency of monitoring must revert back to every four (4) hours of tank operation. After forty (40) hours of monitoring tank operation every four (4) hours with no exceedances, surface tension measurement may be conducted once every eight (8) hours of tank operation. Once there have been no exceedances during forty (40) hours of tank operation, surface tension measurement may be conducted once every forty (40) hours of tank operation on an ongoing basis, until an exceedance occurs.
- (3) An alternative emission limit of 0.01 milligram per day standard cubic meter (mg/dscm) will be applicable if the chromium anodizing tank does not meet the limit above.
- (4) A summary report shall be prepared to document the ongoing compliance status of the chromium anodizing tanks. This report shall be completed annually, retained on site, and made available to IDEM upon request. If there are significant exceedance of chromium air emission limits (as defined in 40 CFR Part 63.347(h)(2)), then semiannual reports shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Branch, Office of Air Management  
Chromium Anodizing  
100 North Senate Avenue, P.O. Box 6015



Indianapolis, Indiana 46206

within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.

If the monitoring data collected by the Permittee in accordance with Permit Condition D.1.6 show that the emission limit has been exceeded, quarterly reports shall be submitted. Once the Permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

- (5) The chromium anodizing operations shall be subject to the record keeping and reporting requirement as indicated in the chromium electroplating NESHAP.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart N.

## **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 045-11822-00011.